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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	NO. 4:24-CR-00225-HSG
)	
Plaintiff,)	STIPULATION AND [PROPOSED] ORDER TO
)	CONTINUE CHANGE OF PLEA HEARING,
v.)	AND TO EXCLUDE TIME AND EXTEND
)	DEADLINE UNDER THE SPEEDY TRIAL ACT
MICHAEL LEE PATTERSON,)	TO MAY 14, 2025
)	
Defendant.)	
)	
)	

IT IS HEREBY STIPULATED, by and between the parties to this action, that the change of plea hearing for defendant Michael Lee Patterson scheduled for April 30, 2025, be continued to May 14, 2025, at 2:00 p.m. for change of plea. The parties have agreed in principle on a resolution, but the parties require additional time to finalize a written plea agreement and to provide defense counsel with sufficient time to thoroughly review the plea agreement with the defendant.

The continuance is sought under the Speedy Trial Act. The parties agree and stipulate that the time until May 14, 2025 should be excluded, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective

1 preparation of counsel and continuity of counsel because the ends of justice served by the granting of the
2 continuance outweigh the best interests of the public and defendant in a speedy and public trial for the
3 reasons described above.

4
5 IT IS SO STIPULATED.

6
7 DATED: April 28, 2025

8 /s/
JONAH P. ROSS
Assistant United States Attorney

9
10 DATED: April 28, 2025

11 /s/
LANCE K. KUBO
Counsel for Defendant Michael Lee Patterson


~~[PROPOSED]~~ ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the change of plea hearing for defendant Michael Lee Patterson, currently scheduled for April 30, at 2:00 p.m., is continued to May 14, 2025, at 2:00 p.m. for change of plea before the Honorable Haywood S. Gilliam, Jr.

IT IS FURTHER ORDERED that the time until May 14, 2025, is hereby excluded from the Speedy Trial Act, under 18 U.S.C. §3161(H)(7)(A) and (B)(iv), for effective preparation taking into account due diligence, and continuity of counsel. The Court finds that the ends of justice served by granting the continuance outweigh the best interests of the public and defendant in a speedy, public trial.

IT IS SO ORDERED.

Dated: 4/28/2025


HON. HAYWOOD S. GILLIAM, JR.
United States District Judge